

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:

CHAPTER 11

BLACK SHEEP FOOD GROUP, LLC

CASE NO. 17-04372-5-JNC

Debtor

MOTION FOR PRODUCTION OF DOCUMENTS UNDER RULE 2004

NOW COMES Black Sheep Food Group, LLC, Debtor in the above-referenced case (hereinafter “Debtor”), by and through undersigned counsel, and pursuant to Federal Rule of Bankruptcy 2004, respectfully moves the Court to enter an Order directing Fundbox, Inc. (hereinafter, “Fundbox”), to produce certain documents described as follows. In support of this Motion, Debtor shows unto the Court the following:

1. Debtor filed a voluntary petition pursuant to Chapter 11 of the Bankruptcy Code on September 6, 2017.
2. Debtor did not list Fundbox as a creditor in its petition having a claim against Debtor’s estate.
3. Debtor believes that it has a claim against Fundbox arising out of a loan agreement between Debtor and Fundbox, under which Fundbox made a short-term loan to Debtor in return for payments made on the loan by Debtor at a high interest rate.
4. Debtor believes that it paid Fundbox nine payments totaling \$12,756.82 in the ninety (90) days prior to filing for bankruptcy relief.
5. Debtor seeks production of the following documents:

- A. Any loan agreements, including promissory notes and security agreements, made between Debtor and Fundbox, its subsidiaries, affiliates, parent companies, or any related entities.
- B. An accounting of payments made on Debtor's account to Fundbox, its agents, subsidiaries, affiliates, for a period of one year prior to filing the petition for bankruptcy on September 6, 2017.
- C. Any and all correspondence between Fundbox, its agents, subsidiaries, affiliates, and Debtor for a period of one year prior to filing the petition for bankruptcy on September 6, 2017.
- D. Any and all documents in the possession of Fundbox, its agents, subsidiaries, affiliates, referring to the Debtor.

WHEREFORE, Debtors respectfully request that the Court enter an Order directing Fundbox to produce the documents listed above to Debtor at the offices of the Janvier Law Firm, 311 E. Edenton Street, Raleigh, North Carolina 27601 on or before June 1, 2018.

Respectfully submitted, this the 8th day of May, 2018.

JANVIER LAW FIRM

s/ Kathleen O'Malley
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing **MOTION FOR PRODUCTION OF DOCUMENTS UNDER RULE 2004** has been served upon each of the parties listed below by placing copies of the same in the United States mail, postage prepaid or electronically as indicated, this the 8th day of May, 2018.

Brian Behr (via CM/ECF)
Bankruptcy Administrator, EDNC
434 Fayetteville Street, Suite 640
Raleigh, NC 27601

Black Sheep Food Group, LLC (Via U.S. Mail)
PO Box 10669
Raleigh, NC 27605

Fundbox, Inc. (Via U.S. Mail)
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JANVIER LAW FIRM

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